

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF FLORIDA

CASE NO. 22-20275-CR-MARTINEZ

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LAVON MOSS, JR.,

Defendant.

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**UNOPPOSED MOTION TO CONTINUE TRIAL**

Defendant, Lavon Moss, through undersigned counsel, respectfully moves for a 30-day continuance of the trial of this case currently set for the two-week trial period commencing October 11, 2022. In support thereof, he states as follows:

After a thorough review of the evidence provided in discovery and applicable law, Mr. Moss filed a motion to suppress on September 30, 2022. The motion is case dispositive. Pursuant to the local rules, the government's response is due October 14, 2022 and if the defense determines a reply is necessary, that reply would be due seven days after the reply, so on approximately October 21, 2022.

Therefore, the defense is requesting a continuance of the trial period to allow sufficient time for the motion to be heard and the court to schedule an evidentiary hearing if it is deemed necessary by the Court upon review of the briefing.

Undersigned counsel will be out of the district on annual leave from October 13<sup>th</sup> -17<sup>th</sup>. Accordingly, undersigned counsel is requesting a continuance of 30 days of the trial period to allow sufficient time for the motion to be fully briefed and heard.

Assistant United States Attorney Yara Dodin does not object to the requested continuance.

WHEREFORE, the defendant respectfully requests this Court continue the trial of this case for at least thirty days.

Respectfully Submitted,

MICHAEL CARUSO  
FEDERAL PUBLIC DEFENDER

BY: s/Aimee Ferrer  
Aimee Ferrer  
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**CERTIFICATE OF SERVICE**

I HEREBY certify that on **October 3, 2022**, I electronically filed the foregoing document with the Clerk of the Court using CM/ECF. I also certify that the foregoing document is being served this day on all counsel of record via transmission of Notices of Electronic Filing generated by CM/ECF or in some other authorized manner for those counsel or parties who are not authorized to receive electronically Notices of Electronic Filing.

By: s/ Aimee Ferrer